

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al., <i>Plaintiffs,</i>	
v.	5:21-cv-0844-XR
GREGORY W. ABBOTT, et al., <i>Defendants.</i>	
OCA-GREATER HOUSTON, et al., <i>Plaintiffs,</i>	
v.	1:21-cv-0780-XR
TEXAS SECRETARY OF STATE JOHN SCOTT, et al., <i>Defendants.</i>	
HOUSTON AREA URBAN LEAGUE, et al., <i>Plaintiffs,</i>	
v.	5:21-cv-0848-XR
GREGORY WAYNE ABBOTT, et al., <i>Defendants.</i>	
LULAC TEXAS, et al., <i>Plaintiffs,</i>	
v.	1:21-cv-0786-XR
JOHN SCOTT, et al., <i>Defendants.</i>	
MI FAMILIA VOTA, et al., <i>Plaintiffs,</i>	
v.	5:21-cv-0920-XR
GREG ABBOTT, et al., <i>Defendants.</i>	

UNITED STATES OF AMERICA,
Plaintiff,

v.

STATE OF TEXAS, et al.,
Defendants.

5:21-cv-1085-XR

PLAINTIFFS' EXPERT DESIGNATION

Plaintiffs Houston Area Urban League, Delta Sigma Theta Sorority, Inc., The Arc of Texas, and Jeffrey Lamar Clemmons (collectively, "Plaintiffs") by and through the undersigned counsel, hereby submit their Initial Expert Designation pursuant to Federal Rule of Civil Procedure 26(a)(2) and the Court's Scheduling Order (Dkt. No. 125), as amended by the Stipulated Extension of Expert Discovery Deadline (Dkt. No. 209).

Plaintiffs designate the following expert witnesses:

J. Morgan Kousser, Ph.D.

Professor of History and Social Science, Emeritus
Caltech Division of the Humanities and Social Sciences
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214 Baxter Hall
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(626) 395-4080

Daniel A. Smith, Ph.D.

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234 Anderson Hall
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University of Florida
Gainesville, FL 32611-7325
(352) 273-2346

Dr. Kousser and Dr. Smith will testify regarding the matters and opinions contained in their expert reports, including amendments and supplements, if any. Dr. Kousser and Dr. Smith were retained by Plaintiffs to provide expert testimony and may be contacted through undersigned counsel.

Discovery is ongoing in this matter and Plaintiffs hereby reserve the right to designate one or more additional expert witnesses for the purpose of addressing, responding to, and/or rebutting Defendants' claims, and/or to address information obtained during discovery.

Further, Plaintiffs reserve the right to supplement and/or amend these designations in compliance with the Federal Rules of Civil Procedure, Court Order, and/or agreement between the parties.

Plaintiffs reserve the right to designate additional experts as allowed by Court Order, the Federal Rules of Civil Procedure, and/or any agreement between the parties. Plaintiffs reserve the right to de-designate any experts and/or to classify them as consulting experts in accordance with the Federal Rules of Civil Procedure and governing case law.

Respectfully submitted February 28, 2022

REED SMITH LLP, NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC., THE ARC OF THE UNITED
STATES, INC.

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** Admitted Pro Hac Vice*

*Counsel for Plaintiffs Houston Area Urban League;
Delta Sigma Theta Sorority, Inc.; The Arc of Texas;
and Jeffrey Lamar Clemmons*

CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2022, a true and correct copy of the foregoing document was filed via the CM/ECF system and all counsel of record were served electronically.

/s/ *Kenneth E. Broughton*
Kenneth E. Broughton